

OFFICE OF
GENERAL COUNSEL

May 10, 2018

Office of the General Counsel
Federal Election Commission
1050 First St, NE
Washington, DC 20463

2018 MAY 16 PM 1:35

MUR # 7384

Dear sir or madam,

I wish to file a formal complaint with you as I believe that an election violation has occurred. Would you be so kind as to review my paperwork and use your judgement to analyze my logic in order to determine if in your expert opinion, that an election violation did occur. I am an average citizen, and thus, not an expert on election laws. However, I do have serious concerns and did some research, which leads me to believe that I should bring my concerns to your attention and request a review.

Complainant (myself):

Donald Scott Priest

Mailing address:

, Visalia, CA 93277

Person/organization believed to have committed violation (respondent)

Election committee and/or individual running for office: Andrew Janz, 22 district for US Congress for California.

Possibly others.

Description/Narrative/potential issues:

I received a hand-written post card in the mail on or about Thursday April 26, 2018, with a post mark from Oakland on 23 April 2018. This post card was not signed and there was no information as to whom it was from and no other information as to who or what organization paid for it. It was political in nature, and supported the candidate Andrew Janz.

I was concerned that this post card was not proper, as I did not know who mailed it and I had expected to see a disclaimer as to who or what organization paid for it. In my research, I determined that the FEC would have jurisdiction since it involves a federal election. I was unable to determine exactly who mailed me this post-card, while I did discover it appears that hand-written post-cards were being done by multiple people/organizations. My research also lead me to look at the donation statements of Mr. Janz's campaign, in which I did not discover any like-kind disclosures of post-cards.

While I cannot determine an exact violation, my logic is based upon a catch-22. If the campaign of Mr. Janz sent, authorized, or paid for the post-card (with volunteer work included), then, this should be disclosed upon the post-card. If an individual not associated with the campaign sent the post-card (as well as the others since it appears to me to be mass produced since the writing and address are different ink colors, but appears the same person wrote it since the O's appear to be the same handwriting), then, the value of these post-cards should be disclosed upon the campaign contributions. I did find contributions of in-kind postage. However, in my opinion, the value of the in-kind contribution would be at the time of transfer of ownership. The transfer of ownership would be when the post-card was placed in the mail, and thus, would be the full price of a hand-written post-card, with postage, as included. Then, this would be multiplied by the number of post cards for a total price. I am unaware of the total numbers involved.

16044474762

In my research, I came across information that there was a post-card party to benefit Mr. Janz at the Democratic Volunteer Center, 960 San Antonio Rd, Palo Alto, CA, on April 30th, which is after my post-card. It appears that these hand-written post-cards are more prevalent than the one I received. However, I have not seen any reference to these on the campaign disclosure website. I am also unsure if something done at the Democratic Volunteer Center would require a disclosure from them on their post-cards, and if this was done.

There also were other people who appear to have provided many hand-written post cards, in which I also could not find any in-kind campaign financial disclosures.

All I know is that I received a post-card, which has a catch-22 issue. It was either not disclosed as to who paid for it, or it was not disclosed as a like-kind campaign contribution to the full value of the post-card at time of transfer. It appears to be much more wide-spread than my simple post-card, and thus, I am sending you this complaint believing that there is likely a bigger issue going on here, and I am hopeful to have you review my common knowledge concerns with your expert opinions and actions, if warranted.

I am fairly clueless to Twitter. However, from a google search, I came across messages from what appears to be Mr. Janz's twitter account, @janzforcongress, which describe and suggest people participate in the post-card writing campaigns. One such tweet appears to be on or about Feb 17, 2018. I did not document all of them, and as of this point, I have not been able to print them out.


These should be actions under the commission's jurisdiction, since it involves election laws and a federal election.

Thank you for your time and consideration,

Respectfully,
Donald Scott Priest
Mailing address:
Cell

Visalia, CA 93277

I certify that as of the time of writing and signing this letter/complaint/request, the facts and beliefs I have stated are true and valid to the best of my abilities and belief. I swear under the penalty of perjury that these statements are accurate, honest, and true to the best of my beliefs.


Donald S Priest

Donald S Priest 5-10-18

Signed to and sworn before me, Bruce A. Blayney, a notary public, on 5-10-2018
See Attached California Jurat

CALIFORNIA JURAT WITH AFFIANT STATEMENT

GOVERNMENT CODE § 8202

- ☒ See Attached Document (Notary to cross out lines 1-6 below)
☐ See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

1 _____
 2 _____
 3 _____
 4 _____
 5 _____
 6 _____

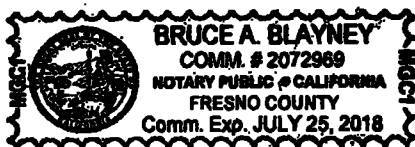
Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of FRESNO



Subscribed and sworn to (or affirmed) before me

on this 10 day of MAY, 2018
 by _____ Date Month Year

(1) Donald S. Priest

(and (2) _____),
 Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature Bruce A. Blayney
 Signature of Notary Public

Seal
 Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Letter to Office of General Counsel Document Date: 5-10-2018

Number of Pages: 2 Signer(s) Other Than Named Above: NONE

1604447494

Dear Good VOTER AND

CA 945
23 APR 18
PM 5 L
The primary election is June 5th

Help elect local Democrat + Fresno
County prosecutor Andrew Janz to replace
Congressman Devin Nunes. Andrew is
the son of immigrants. He will
fight for working families. Vote for
Andrew Janz

good voter at

VISALIA, CA 93277



16044474769

Dear sir or madam,

I don't know if you can check or include this in your investigation and/or review, but I feel that this post-card/disclosure issue may be much bigger. It may also include people - the same groups/ones involved writing post-cards for other candidates, as well as many, many more people - besides myself - receiving post-cards for Mr. Jamz.

Thank you.

D

Search

Donnie Home Find Friends

Events

Events

Calendar

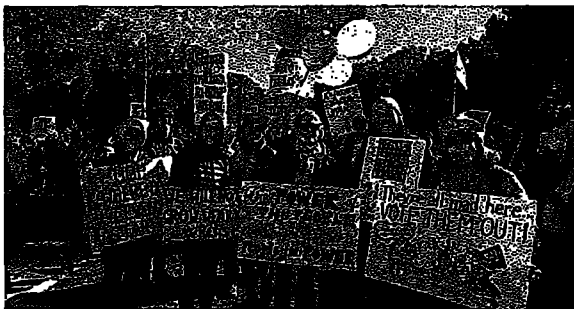
Birthdays

Discover

Postcard Party at Carrie Shaw's house

Past

Create Event



MAY
16

Postcard Party at Carrie Shaw's house

Public · Hosted by Sister District Project and Sister District - CA-3

Interested

Going...

Share

May 16 at 6:00 PM - 9:00 PM

MAY
16

Wed 6:00 PM

Central Davis; message us on Facebook or email us at

About

Discussion

18 Interested

Share this event with your friends

Share

Details

Join Carrie on the second Wednesday of every month from 6-9 p.m. to write postcards to voters on behalf of Democratic candidates. If you're new to postcarding, we'll help you! If you're experienced, come for the company and encouragement!

Upcoming Dates

MAY
16

Wed 6:00 PM - 9:00 PM

Interested

Going

See More Dates

Share In Messenger

To: Choose friends

Add a message...

Recent Posts



Carrie Shaw — NOTE APRIL DATE CHANGE: We will be meeting to write postcards in April on MONDAY, APRIL 9TH 7-9 PM at my house in central Davis. Email me for address...

March 29



Carrie Shaw — We'll be doing postcards from 6 - 9 pm. Come at 6 and bring a take-out dinner if you wish. Stay until 8 and then leave for home in time to get kids in...

February 3

See All Posts

Suggested Events



2018 Downtown Visalia CA
Sat May 19 at Main St Visalia...
2 friends are interested
Interested · Going



Opening night of Downtown
6 PM at Farmers Market
1,348 guests
Interested · Going



March Against Veterans Suicide
Sun May 20 at Tulare Veterans...
422 guests
Interested · Going



Pride Visalia 2018 with E...
Sat May 26 at 300 E Oak Ave...
160 guests
Interested · Going



Murder Mystery Dinner
Fri Jun 15 at Visalia Convention...
Cheri is interested
Interested · Going



The Little Mermaid Junior
Fri Jun 8 at Rotary Theater
Cheri is interested
Interested · Going

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INSTANT GAMES

More



Create New Group

Turn on chat to see who's available.

Search

Featuring



Sister District Project

Nonprofit Organization · San Francisco, California

The Sister District Project harnesses the volunteer and economic resources of progressives in deep blue (or red) areas and channels them toward winnable and strategic state races across the country that need support.

www.sisterdistrict.com



Sister District - CA-3

Community

We are the Sister District team for California's 3rd congressional district.



2 posts in the discussion.

[See Discussion](#)

INSTANT GAMES:



[MORE](#)


YOUR GAMES




[MORE](#)


 Angela Jones 1h


 Lu Angelo


 Thomas Fila 2h

 Debbie Wasty

 Bridget Michael Ellis 7h

 Gina Legan Priest 7h

 Millie Lee Leader 7h

 Erin Brooks 7h

GROUP CONVERSATIONS:

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Turn on chat to see who's available.

[Search](#)

100444747988

Indivisible Colusa County

event

Postcards to Voters Party - Janz for Congress

Date, time and location

Monday, May 14, 2018

06:00 PM to 08:00 PM

Roundtable Pizza's party room, 1031 Bridge St., Colusa, CA

We're getting together to write postcards asking voters in the Fresno area to support Andrew Janz for Congress in the June 5 primary election. Janz is running in California Congressional District 22 against incumbent Devin Nunes.

We'll supply postcards, scripts, pens and markers and stamps. Join us! Writing postcards to voters is a fun and easy way to get out the VOTE.

Posted Apr 29, 2018

Share 0

Tweet

Indivisible - with liberty and justice for all



10074747-57-00

Senator Dianne Feinstein

Website

San Francisco

(415) 393-0707

Washington, DC

(202) 224-3841

Fresno

(559) 485-7430

Los Angeles

(310) 914-7300

San Diego

(619) 231-9712

Senator Kamala Harris

Website

Sacramento

(916) 448-2787

Washington, DC office

(202) 224-3553

San Francisco

(415) 355-9041

Fresno

(559) 497-5109

Los Angeles

(213) 894-5000

San Diego

(619) 239-3884

Congressman John Garamendi

Website

Davis

(530) 753-5301

Washington, DC

(202) 225-1880

Yuba City

(530) 329-8865

Fairfield

(707) 438-1822

+1



**Stand Indivisible with
us**

Sign up for updates



**Read the Indivisible
Guide**

**Best practices for
making Congress listen.**



**Contact Indivisible
Colusa County**

indivisiblecolusa@gmail.com

**We're located in
Colusa County, CA**

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Events

Events

Calendar

Birthdays

Discover

Past

Canceled! Postcards for Andrew Janz

Create Event



APR
27

Canceled! Postcards for Andrew Janz

Public · Hosted by Sister District - CA-3

Interested

Going

Friday, April 27 at 6 PM - 8 PM
about 1 week ago

Central Davis (message or email for address)

About

Discussion

0 Went · 1 Interested

Share this event with your friends

Details

Sorry but we've had to cancel this postcard party due to host feeling under the weather. Please join us for 4/28 canvassing and 5/1 postcarding instead!

Kid Friendly

About Sister District - CA-3



Sister District - CA-3

Community

We are the Sister District team for California's 3rd congressional district.

Suggested Events



Visalia's Heroes and Villains
Saturday at Main St. Visalia, Ca...
749 guests
Interested · Going



2018 Downtown Visalia Ca...
Sat May 19 at Main St. Visalia...
2 friends are interested
Interested · Going



Opening night of Downtown Visalia
6 PM at Farmers Market
1,348 guests
Interested · Going



March Against Veteran Suicide
Sun May 20 at Tulare Veterans...
422 guests
Interested · Going



Pride Visalia 2018 with Equi...
Sat May 26 at 300 E Oak Ave...
160 guests
Interested · Going



Murder Mystery Dinner
Fri Jun 15 at Visalia Convention...
Cheri is interested
Interested · Going

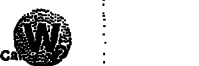
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Français (France) · Deutsch

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INSTANT GAMES



YOUR GAMES



Angelo Jones

Thomas Fife

Debbie Westby

Bridget Michael Ellis

Gina Leann Priest

Millio Lee Leader

Erin Brooks

CONVERSATIONS

Create New Group

Turn on chat to see who's available.

Search

100047474802



Log in Sign up

Past Meetup

Postcard Party to GOTV for Democrat Andrew Janz & defeat Republican Devin Nunes

Hosted by Geri

From #Resist: Palo Alto

This Meetup is past

Ⓐ Tuesday, May 8, 2018
7:00 PM to 9:00 PM

Ⓐ Democratic Volunteer Center
960 San Antonio Rd, Palo Alto · Palo Alto

NOTE: Location but no disclosures.



Details

- What we'll do

Please RSVP at <https://tinyurl.com/y8aktjzr>

Come help get out the vote for Democrat Andrew Janz, who is running to defeat Republican Devin Nunes in the race for Congress in California's District 22. We will be sending postcards to registered Democrats in CD22, reminding them to vote in the Primary Election in June. It is vital that a Democrat be one of the top two candidates elected in California's Jungle Primary, or we could end up with two Republicans and no Democrat on the ballot for that race in November.

Postcards and stamps will be available at the event, free of charge. We will provide coffee and water for folks to enjoy while they write, and if folks wish to bring potluck snacks to share then we can enjoy some yummy foods together, too.

Please RSVP at <https://tinyurl.com/y8aktjzr> - and if you have any questions, please email us at [masked] - thanks!

• What to bring

• Important to know

Attendees (1)

[See all](#)



Event organizer

See all Meetups from

#Resist: Palo Alto

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6088447444091

Check Andrew Janz
twitter.

① Janz for Congress

"Jan^{it appears}z Knows & Approves"

for example -

Feb 17
calls for all #Janz Fans to
join his postcard writing campaign.

goal
Sent to every democratic voter in CA22

This would be a lot of either
unreported donations and/or lack of
disclosure for who paid.

1990444744807

RE: election mailing, no description of who paid, etc, have concerns

INFO <info@fec.gov>

Mon 4/30/2018 2:08 PM

To: Donnie Priest <

Good morning,

Any person may file a complaint if he or she believes a violation of the Federal Election Campaign Laws or Commission regulations has occurred or is about to occur. The complaint must be made in writing and sent to the Office of General Counsel, Federal Election Commission, 1050 First Street, NE, Washington, DC 20463.

The original must be submitted along with three copies, if possible. Facsimile or e-mail transmissions are not acceptable. A complaint must comply with certain requirements. It must:

- Provide the full name and address of the person filing the complaint (called the complainant); and
- Be signed, sworn to and notarized.

This means that the notary public's certificate must say "...signed and sworn to before me...", or words that connote the complaint was affirmed by the complainant, (such as "under penalty of perjury").

Furthermore, in order for a complaint to be considered complete and proper, it should:

- Clearly recite the facts that show specific violations under the Commission's jurisdiction (citations to the law and regulations are not necessary);
- Clearly identify each person, committee or group that is alleged to have committed a violation (called the respondent);
- Include any documentation supporting the allegations, if available; and
- Differentiate between statements based on the complainant's (the person who files the complaint) personal knowledge and those based on information and belief. Statements not based on personal knowledge should identify the source of the information.

For additional information, please visit this link: <https://www.fec.gov/legal-resources/enforcement/complaints-process/how-to-file-complaint-with-fec/>

FEC Information Division

Please note that the guidance provided by this correspondence is strictly informational and is NOT legally binding. Only the Commission, via the Advisory Opinion process, has the authority to issue a legally binding opinion. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail.

From: Donnie Priest [mailto:
Sent: Friday, April 27, 2018 4:25 PM
To: INFO <info@fec.gov>
Subject: Fw: election mailing, no description of who paid, etc, have concerns

Dear the FEC,

I need some guidance, and was incorrect sending it to the state organization below. I am hopeful for guidance on how to file a complaint, if this mailing violates election laws, which I think it does. Please see below, but the CA dept cannot act since it is a federal election.

Thank you
Donnie Priest

From: Donnie Priest <
Sent: Friday, April 27, 2018 7:01 PM
To: complaint@fpcc.ca.gov
Subject: election mailing, no description of who paid, etc, have concerns

Dear sir or madam,

I received this political election related mailing for our local congress (federal) election coming up, supporting a candidate. It concerned me that there was no listing of who paid for the ad, as I believe is required. I have the original, and it is a picture with a paper (letter) glued to the other side. I am under the impression that this likely violates at least one election law, but as an average citizen, I am not sure. I would also appreciate guidance on how to file a formal complaint. Further, the letter states that the candidate supported by the mailing works in the public sector as a DA prosecutor, and this also raises further ethical aspects as I do not believe that a DA prosecutor should be violating campaign laws, if he is.

Can you provide me guidance on how to proceed with a formal complaint to have this reviewed by a person, organization, or group of people with more insight and knowledge and authority than I have as a common average citizen.

Thank you
Donnie Priest

Visalia, CA 93277

From: Donnie Priest <
Sent: Thursday, April 26, 2018 11:27 PM
To: Donnie Priest
Subject:

Sent via my Samsung Galaxy, an AT&T 4G LTE smartphone

19044474810

Outlook Mail RE: Election mailing, no description of who paid, etc, have
 Multiple suggestions found, use up or down arrow to navigate items
 concerns

Chloe Hackert <CHackert@fppc.ca.gov>

Fri 4/27/2018 7:49 PM

To: Donnie Priest <

Good afternoon,

The Commission enforces the provisions of the Political Reform Act ("Act") found in Government Code Section 81000. The Enforcement Division of the Commission has no jurisdiction to enforce violations of any laws other than the Act. The Act covers state and local candidates in California. Since this mailing addresses federal candidates, you may wish to forward your complaint to the Federal Elections Commission (the FEC).

Sincerely,



Chloe Hackert
 Enforcement Division
 CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION
 1102 Q Street, Suite 3000 | Sacramento, CA 95811

chackert@fppc.ca.gov

Confidentiality Notice: This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any review, use, disclosure, or distribution not authorized by the intended recipient(s) is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

From: Donnie Priest [mailto:
 Sent: Friday, April 27, 2018 12:01 PM
 To: Complaint <Complaint@fppc.ca.gov>
 Subject: election mailing, no description of who paid, etc, have concerns

Dear sir or madam,

I received this political election related mailing for our local congress (federal) election coming up, supporting a candidate. It concerned me that there was no listing of who paid for the ad, as I believe is required. I have the original, and it is a picture with a paper (letter) glued to the other side.

I am under the impression that this likely violates at least one election law, but as an average citizen, I am not sure. I would also appreciate guidance on how to file a formal complaint. Further, the letter states that the candidate supported by the mailing works in the public sector as a DA prosecutor, and this also raises further ethical aspects as I do not believe that a DA prosecutor should be violating campaign laws, if he is.

Can you provide me guidance on how to proceed with a formal complaint to have this reviewed

16044474811

by a person, organization, or group of people with more insight and knowledge and authority than I have as a common average citizen.

Thank you
Donnie Priest

Visalia, CA 93277

From: Donnie Priest <
Sent: Thursday, April 26, 2018 11:27 PM
To: Donnie Priest
Subject:

Sent via my Samsung Galaxy, an AT&T 4G LTE smartphone

19044474812